

Mr. Frank Hezoucky  
Hendrickson Trailer Suspension Systems  
180 Mount Zion Road  
Lebanon, IN 46052

Re: **011-13885-00037**  
First Administrative Amendment to  
**Part 70 011-11925-00037**

Dear Mr. Hezoucky:

Hendrickson Trailer Suspension Systems was issued a permit on October 2, 2000 for a stationary metal finishing plant for trailer suspension systems. A letter requesting the addition of 26 new robotic GMA welding stations to the existing complement of 13 was received on February 7, 2001. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

Hendrickson Trailer Suspension Systems has proposed the addition of 26 new robotic GMA welding stations to the existing complement of 13. The unrestricted PM(PM10) potential to emit from the additional welding stations is estimated to be 2.95 tons/yr (0.67 lb/hr) and the unrestricted manganese (single HAP) is estimated to be 0.148 ton/yr. Both are at exempt levels under 326 IAC 2-1.1-3. The emissions will not be controlled. There will be no new applicable requirements triggered or existing permit terms violated.

In addition, the proposed welding stations are determined to be part of an insignificant activity pursuant to 326 IAC 2-7-1(21). Pursuant to 326 IAC 2-7-1(21)(B) and (C), an emission unit or activity with potential uncontrolled emissions of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM10) of 5 pounds per hour or less and potential uncontrolled single and combined hazardous air pollutant (HAP) emissions of less than or equal to 1 ton per year and 2.5 tons/yr, respectively, not regulated by a national emission standard for hazardous air pollutants (NESHAP), is an insignificant activity under the Part 70 program.

The activity consists of the new proposed and existing welding stations. The combined PM10 emissions from these welding stations are estimated to be 1.01 lb/hr which are less than the applicable level of 5 lb/hr. The only HAP emitted by the welding stations is manganese. The uncontrolled HAP emissions are estimated to be 0.22 ton/yr which are less than the applicable single HAP level of 1 ton/yr. Thus, the welding stations qualify as an insignificant activity.

The proposed welding station shall be incorporated into the Title V permit via an administrative amendment because the addition of the welding stations to the Title V permit is a revision of descriptive information where the revision will not trigger a new applicable requirement or violate a permit term as specified in 326 IAC 2-7-11(a)(8).

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

SDF

cc: File - Boone County  
U.S. EPA, Region V  
Boone County Health Department  
Air Compliance Section Inspector - Marc Goldman  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# **SIGNIFICANT SOURCE MODIFICATION AND PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**Hendrickson Trailer Suspension Systems  
180 Mount Zion Road  
Lebanon, IN 46052**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T011-11925-00037	Date Issued: October 2, 2000
First Administrative Amendment No.: T011-13885-00037	Affected Pages: 5, 6, and 31
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary metal finishing plant for trailer suspension systems.

Responsible Official:	Joseph M. Ross
Source Address:	180 Mount Zion Road, Lebanon, IN 46052
Mailing Address:	180 Mount Zion Road, Lebanon, IN 46052
Phone Number:	765-483-5362
SIC Code:	3714
County Location:	Boone County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source under PSD Rules; Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) paint spray booth, identified as EP-2, with a maximum production rate of 21.47 trailer parts per hour, using a dry filter as control, exhausting at Stack 1, identified as S-1.
- (b) One (1) paint spray booth, identified as EP-9, with a maximum production rate of 16.91 trailer parts per hour, using a dry filter as control, exhausting at Stack 2, identified as S-2.

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Grinding and machining operation controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following; deburning, buffing, polishing, abrasive blasting, pneumatic conveying and woodworking operations. (Two belt grinders, identified as EP-4, each connected to a cyclone separator and a baghouse)

- (b) Robotic welding, identified as EP-6, **including thirty-nine (39) robotic GMA welding stations**, equipped with one (1) baghouse, emitting ~~greater than one (1) pound per day but less than five (5) pounds per day or~~ **equal to or less than** one (1) ton per year of a single HAP.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPS; brazing equipment, cutting torches, soldering equipment and welding equipment. (Manual welding, identified as EP-7, equipped with one baghouse, and plasma arc cutting, identified as EP-5)
- (d) Degreasing operations, that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. (Maintenance cleaning station and paint booth parts cleaner, identified as EP-12)

**A.4 Part 70 Permit Applicability [326 IAC 2-7-2]**

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because it is a major source, as defined in 326 IAC 2-7-1(22).

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities - Grinding and Welding

Grinding and machining operation controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following; deburning, buffing, polishing, abrasive blasting, pneumatic conveying and woodworking operations. (Two belt grinders, identified as EP-4, each connected to a cyclone separator and a baghouse)

Robotic welding, identified as EP-6, **including thirty-nine (39) robotic GMA welding stations**, equipped with one (1) baghouse, emitting ~~greater than one (1) pound per day but less than five (5) pounds per day or equal to or less than one (1) ton per year of a single HAP.~~

The following equipment related to manufacturing activities not resulting in the emission of HAPS; brazing equipment, cutting torches, soldering equipment and welding equipment. (Manual welding, identified as EP-7, equipped with one baghouse, and plasma arc cutting, identified as EP-5)

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) limitation is as follows:

- (a) The belt grinders, identified as EP-4, shall be limited to 3.8 lb/hr based on a process weight rate of 1,786 lbs/hr;
- (b) The robotic welding, identified as EP-6, shall be limited to 1.347 lb/hr based on a process weight rate of 380 lbs/hr;
- (c) The manual welding, identified as EP-7, shall be limited to .55 lb/hr based on a process weight rate of 100 lbs/hr

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

### Compliance Determination Requirements

#### D.2.2 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2:

- (a) The baghouses and cyclones shall be in operation at all times the belt grinders, identified as EP-4, are in operation;
- (b) The baghouse shall be in operation at all times the robotic welders, identified as EP-6, are in operation.